

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Criminal No. 2:18-cr-00703-JMV
	:	
v.	:	Honorable John Michael Vazquez
	:	
LEE VANDER WADE,	:	

**AFFIDAVIT IN SUPPORT OF DEFENDANT’S MOTION TO ALLOW ACCESS
TO DISCOVERY AT MONMOUTH COUNTY JAIL VIA A DEDICATED
LAPTOP**

Defendant, Leevander Wade, by and through his counsel, Troy A. Archie, Esquire, hereby respectfully moves to obtain access to discovery via a dedicated laptop to be provided by Counsel through Cornerstone Legal Consultants. In support thereof, Mr. Wade avers the following:

1. As this court is aware, Mr. Wade is currently detained at Monmouth County Jail pending trial in the above referenced capital prosecution.
2. Since the onset of the national COVID 19 Pandemic, Mr. Wade has made several complaints regarding access to discovery in this case.
3. Due to COVID 19 Monmouth County inmates are subject to limited library time to review digital discovery. Mr. Wade indicates that for the past six months he has been allowed 1-3 hours per week for computer aided discovery review. The 3 hours only if he is lucky and in reality most of the time it is 1-2 hours.
4. The discovery in this capital matter is voluminous including over 14,000 audio and videos files combined. (See Exhibit “A”).
5. Mr. Wade indicated that he has had tremendous difficulty in trying to review digital discovery because of the limited time he gets per session. In fact, Mr. Wade indicates that many times, by the time he finds what he is looking for and loads it up in the computer, his time for review is over and he accomplishes nothing.
6. The defense has an IT provider, Cornerstone Legal Consultants who can outfit a laptop specifically for Mr. Wade that is user friendly with a table of context for

Mr. Wade to access all discovery including all audios and videos. Cornerstone also will get the laptop to any specifications required by Monmouth County Jail including disabling any internet access.

7. If Mr. Wade is allowed a laptop and can maintain it in his cell during the daytime hours, he will be able to catch up on discovery review that has been unfruitful since last summer. Even if he is only allowed to use the laptop during the 1-3 hours allocated presently due to COVID 19 restrictions, he would still catch up on discovery review bases on the user friendly table of contexts and click and play nature of the laptop to be provided by Cornerstone.

8. Based on the aforementioned circumstances and the fact that this is a capital prosecution at worst and a potential life prison sentence at best, we respectfully request the Courts interventions to ORDER Monmouth County Jail to allow Leevander Wade access to his discovery via a dedicated laptop.

9. I have confirmed with the Government on this issue and they take no position as to on request on behalf of Leevander Wade.

Dated: May 25, 2021

Respectfully submitted,

/s/ Troy A. Archie
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing served via the Electronic Case Filing (ECF) System this May 25, 2021 upon the following:

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Dated: May 25, 2021

Respectfully submitted,

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